IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: COLOPLAST CORP. PELVIC SUPPORT SYSTEMS PRODUCTS LIABILITY LITIGATION

MDL NO. 2387

THIS DOCUMENT RELATES TO

ALL COLOPLAST WAVE 5, 6, AND 7 CASES

DEFENDANT COLOPLAST CORP.'S MOTION TO EXCLUDE OR LIMIT THE OPINION TESTIMONY OF BRUCE ROSENZWEIG, M.D.

PLEASE TAKE NOTICE that upon Defendant Coloplast Corp.'s ("Coloplast")

Motion to Exclude or Limit the Opinion Testimony of Bruce Rosenzweig, M.D., the exhibits attached hereto, the supporting Memorandum of Law, and all papers and pleadings on file in this action, Coloplast will move this Court, before the Honorable Joseph R. Goodwin, United States District Judge, in the Robert C. Byrd United States Courthouse, located at 300 Virginia Street East, Charleston, West Virginia 25301, for (i) an Order excluding or limiting the opinions and/or testimony of this expert witness, and (ii) such other and further relief as the Court deems just and proper.

The Exhibits attached hereto are as follows:

- Exhibit 1: List of Cases to which this motion applies;
- Exhibit 2: Excerpts of Expert Report (POP) of Bruce Rosenzweig;
- Exhibit 3: Excerpts of Expert Report (T-Sling) of Bruce Rosenzweig;
- Exhibit 4: Excerpts of Expert Report (Aris) of Bruce Rosenzweig;
- Exhibit 5: Excerpts of 5/2/19 General Deposition of Bruce Rosenzweig;
 and

• Exhibit 6: Excerpts of 9/22/15 *In re Ethicon* Deposition of Bruce Rosenzweig.

Dated: May 13, 2019 Respectfully submitted,

/s/ Lana K. Varney
Lana K. Varney
KING & SPALDING LLP
500 West 2nd Street, Suite 1800
Austin, TX 78701
512.457.2060 (phone)
512.457.2100 (fax)

lvarney@kslaw.com

Attorney for Defendant Coloplast Corp.

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2019, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Lana K. Varney
Lana K. Varney